

# **Our Approach to Roadless Area Analysis And Analysis of Unroaded Lands Contiguous to Roadless Areas**

## **Introduction**

This paper is intended to provide guidance on how to analyze proposed actions located in roadless areas<sup>1</sup>, or on lands that are unroaded and are contiguous to these roadless areas. It provides examples and techniques for analyzing and displaying effects that activities such as road construction and timber harvest could have on roadless characteristics and wilderness features of such areas.

The guidance describes the legislative, judicial and administrative actions that have influenced the analysis process for roadless areas. It identifies what factors should be considered during the analysis process.

## **Legislative, Judicial and Administrative Actions That Have Influenced How the Impacts of Proposed Actions on the Roadless Resource Should be Considered**

It is important to understand the events leading to the current position about completing analysis for roadless areas and unroaded areas contiguous to roadless areas. This section briefly describes actions that have occurred and highlights key points.

The concept of wilderness in the National Forest System was first implemented in 1924 with administrative designation of the Gila Wilderness in New Mexico. By 1964, 14.6 million acres of National Forest System land had been administratively classified as wilderness, wild, or primitive.

In 1964, Congress passed the Wilderness Act, creating the National Wilderness Preservation System. In addition to designating 9 million acres of National Forest System land as Wilderness, the Act directed the Secretary of Agriculture to complete a study of 34 administratively designated "primitive areas" and determine their suitability for

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<sup>1</sup> Roadless Areas outside of Idaho are those areas designated as Inventoried Roadless Areas pursuant to 36 CFR 294 Subpart B, §294.11. This includes areas identified in a set of inventoried roadless area maps, contained in Forest Service Roadless Area Conservation, Final Environmental Impact Statement, Volume 2, dated November 2000.

Roadless Areas in Idaho are those areas identified as Idaho Roadless Areas and designated pursuant to 36 CFR 294 Subpart C §294.21. Idaho Roadless Areas are identified in a set of maps maintained at the national headquarters office of the Forest Service.

Wilderness designation by September 2, 1974.

In 1971 the Forest Service expanded the scope of the review to include all roadless areas in the inventory and evaluation. This process was known as the Roadless Area Review and Evaluation (RARE). The Final Environmental Impact Statement (FEIS) for RARE was released in 1973. The FEIS identified 247 roadless areas to be studied further for possible wilderness status as part of the multiple-use planning process used at the time. The National Forest Management Act of 1976 (NFMA) replaced that process with the requirement for an integrated Land and Resource Management Plan (LRMP) for each forest and grassland.

By June of 1977, concerns were expressed that the NFMA land management planning process would be too slow to allow timely completion of review of the 247 study areas identified in RARE. Concerns were also raised that some areas might have been overlooked, and that RARE did not adequately inventory the National Grasslands and the Eastern National Forests. In response to these concerns, the Secretary of Agriculture initiated a nationwide administrative study of roadless areas referred to as RARE II. The FEIS for RARE II was released in January of 1979.

In June, 1979 the State of California initiated a lawsuit (*California v. Block*) challenging a RARE II decision to designate certain roadless areas in California as non-wilderness. In June of 1980 the U.S District Court ruled that the Rare II FEIS did not comply with the National Environmental Policy Act (NEPA). The Ninth Circuit Court of Appeals affirmed this decision and identified the following deficiencies:

“Failure to identify distinguishing wilderness characteristics of each roadless area.”

“Failure to adequately assess the wilderness value of each area and to evaluate the impact of non-wilderness designation upon each area's wilderness characteristics and value.”

“Failure to consider the effect of non-wilderness classification upon future wilderness opportunities.”

“Failure to weigh the economic benefit attributable to development in each area against the wilderness loss each area will suffer from development.”

The decision was largely based on the Court's interpretation that NFMA regulations (36 CFR 219.12(e) [pre 1982]) precluded further consideration of wilderness features in assessing environmental consequences of development projects in areas not recommended for wilderness. Because of this lack of discretion, the Court concluded that “[t]he critical decision to commit these areas for non-wilderness uses, at least for the next ten to fifteen years is irreversible and irretrievable.”

Following the Court's decision, the Department of Agriculture revised the NFMA

regulations regarding evaluation of roadless areas in forest planning (36 CFR 219.17 [1982]). These changes included:

“Establishment of new forest planning procedures for evaluating roadless lands for recommendation as wilderness.”

“Removal of language that the Ninth Circuit Court interpreted to mean the Forest Service was foreclosed from considering the roadless character of a roadless area if specific projects were proposed and evaluated in areas allocated to non-wilderness management.”

The 1982 regulations allowed adequate discretion over development of inventoried roadless areas, after approval of forest plans, by making non-wilderness allocation of roadless lands not a "critical decision" or an "irreversible and irretrievable" commitment of resources to development. This premise has been since affirmed by the Ninth Circuit Court of Appeals in *Tenakee Springs v. Block* (1986). In its decision, the Court found that non-wilderness multiple-use management prescriptions on the Tongass National Forest Plan are permissive rather than a mandate or commitment to development. The concurring opinion also agreed that after promulgation of the forest plan, NEPA documents for projects proposed for roadless areas assigned to a non-wilderness management prescription must examine the issue of whether to develop, not just how to develop such areas.

In 1994 the 9<sup>th</sup> Circuit Court of Appeals further addressed the need to analyze the effects to roadless areas in its opinion on the Gatorson Sale (*Smith v. USFS*). It states:

“There is, moreover, an additional significance, beyond the effect on "roadlessness," to the agency's decision to approve a logging sale on a 5,000 acre roadless area. Judicial review of the wilderness option is not foreclosed forever by the WSWA<sup>2</sup>. Under that Act, the wilderness option for inventoried lands may be revisited in second-generation Forest Plans. WSWA Sec. 5(b)(2), 98 Stat. at 303; *National Audubon*, 4 F.3d at 837. Accordingly, when the agency is considering the development of a 5,000 acre roadless area, selection of a no-action alternative, which the agency is required to consider, *Idaho Conservation*, 956 F.2d at 1515 (citing *City of Tenakee Springs v. Block*, 778 F.2d 1402, 1406 (9th Cir.1985)), would preserve the possibility that the area might someday be designated as wilderness. Clearly, under the WSWA, the agency is not required to preserve any released roadless area for wilderness consideration in second-generation Forest Plans. WSWA Sec. 5(b)(3), 98 Stat. at 303. But the possibility of future wilderness classification triggers, at the very least, an obligation on the part of the agency to disclose the fact that development will affect a 5,000 acre roadless area.”

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<sup>2</sup> Washington State Wilderness Act (WSWA).

The 9<sup>th</sup> Circuit reaffirmed this opinion in 2008 on the School Fire Salvage Recovery Project (*Lands Council v. Martin*). It states

“In *Smith*, 33 F.3d at 1078-79, we held that there are at least two separate reasons why logging in roadless areas is environmentally significant, so that its environmental consequences must be considered. First, roadless areas have certain attributes that must be analyzed. Those attributes, such as water resources, soils, wildlife habitat, and recreation opportunities, possess independent environmental significance. Second, roadless areas are significant because of their potential for designation as wilderness areas under the Wilderness Act of 1964, 16 U.S.C. §§ 1131-1136. *Lands Council*, 479 F.3d at 640; *Smith*, 33 F.3d at 1078-79.”

### **Summary of Required Analysis for Roadless Areas**

Based on court history and past direction from the Chief, projects within roadless areas must analyze the environmental consequences, including irreversible and irretrievable commitment of resources on roadless area attributes, and the effects for potential designation as wilderness under the Wilderness Act of 1964.

### **Administrative Actions That Have Influenced How We Analyze the Impacts of Proposed Actions on Unroaded Lands Contiguous to Roadless Areas**

In 1994 the 9<sup>th</sup> Circuit Court of Appeals further addressed the need to analyze the effects on the roadless resource in its opinion on the Gatorson Sale (*Smith v. USFS*). It states:

“*Smith* contends that the NEPA documents prepared by the agency in connection with the Gatorson Sale are inadequate because they fail to address the impact of the sale on a roadless area of more than 6,000 acres to the west of Thompson Ridge Road. This parcel of land is comprised of 4,246 acres of uninventoried land in the Conn Merkel Area as well as about 2,000 acres of inventoried land in the Twin Sisters Area. Under WSWA Sec. 5(b), this court may not review the adequacy of the agency's consideration of the wilderness option for this land because a portion of the land was inventoried pursuant to RARE II and the remainder is smaller than 5,000 acres. *Smith's* argument, however, is that the WSWA does not excuse the agency from considering the effect of a logging project on the roadless character of inventoried land, and does not prohibit this court from reviewing the agency's failure to do so....

The agency has never, in its NEPA documents, taken into account the fact that the sale will affect a 5,000 acre roadless area. In both the Colville Forest EIS and the Gatorson EA, the agency recognized that a portion of the Twin Sisters RARE II Area contains no roads, but dismissed the fact as irrelevant for wilderness consideration purposes because that portion would not stand alone as a 5,000 acre

roadless area. Similarly, in both documents, the agency concluded that the Conn Merkel Area cannot stand alone as a 5,000 acre roadless area because of Thompson Ridge Road. But nowhere has the agency disclosed that the inventoried and uninventoried lands together comprise one 5,000 acre roadless area. As discussed above, the decision to harvest timber in a 5,000 acre roadless area is environmentally significant. We held in *National Audubon* that the agency must, under NEPA, consider the effect of a logging project on such a resource. We now therefore must hold that the agency's obligation to take a "hard look" at the environmental consequences of the proposed sale and consider a no-action alternative require it, at the very least, to acknowledge the existence of the 5,000 acre roadless area. See *Greenpeace Action*, 14 F.3d at 1332; 40 C.F.R. Secs. 1502.14, 1502.16 (1993)."

The 9<sup>th</sup> Circuit reaffirmed this opinion in 2008 making clear the analysis must encompass uninventoried roadless lands. The 9<sup>th</sup> Circuit Opinion in the School Fire Salvage Recovery Project (*Lands Council v. Martin*) states:

"Citing *Smith v. United States Forest Service*, 33 F.3d 1072 (9th Cir. 1994), and *National Audubon Society v. United States Forest Service*, 46 F.3d 1437 (9th Cir. 1993), Plaintiffs argue that the EIS violates NEPA because it does not contain an adequate discussion of the effects of the proposed logging on the roadless character of two substantial roadless areas. West Tucannon roadless area is a bounded uninventoried roadless area that contains 4,284 acres. Upper Cummins Creek roadless area is an uninventoried roadless area that contains 966 acres but, when combined with the adjacent Willow Springs inventoried roadless area, forms a "roadless expanse" of more than 13,000 acres. See *Smith*, 33 F.3d at 1078 (referring to a contiguous area comprised of an uninventoried roadless area and an inventoried roadless area as a "roadless expanse").

In *Smith*, 33 F.3d at 1078-79, we held that there are at least two separate reasons why logging in roadless areas is environmentally significant, so that its environmental consequences must be considered. First, roadless areas have certain attributes that must be analyzed. Those attributes, such as water resources, soils, wildlife habitat, and recreation opportunities, possess independent environmental significance. Second, roadless areas are significant because of their potential for designation as wilderness areas under the Wilderness Act of 1964, 16 U.S.C. §§ 1131-1136. *Lands Council*, 479 F.3d at 640; *Smith*, 33 F.3d at 1078-79.

Plaintiffs do not challenge the EIS's discussion of the *attributes* of the roadless areas. Instead, they argue that the EIS does not comply with the requirement in *Smith* that the roadless areas be discussed in the context of their *potential for wilderness designation*. In *Smith*, we held that "the possibility of future wilderness classification triggers, at the very least, an obligation on the part of the agency to disclose the fact that development will affect a 5,000 acre roadless area." 33 F.3d at 1078. Defendants respond that the EIS is sufficient because, unlike the roadless area at issue in *Smith*, each roadless area here is uninventoried

and contains less than 5,000 acres. We hold that those characteristics do not provide a meaningful legal distinction from the roadless area in *Smith*.

The Upper Cummins Creek roadless area is indistinguishable from the roadless area at issue in *Smith*. In *Smith*, we considered an uninventoried roadless area of approximately 4,000 acres that was contiguous to an inventoried roadless area of approximately 2,000 acres. 33 F.3d at 1077. Logging was scheduled to occur only in the uninventoried land, but we concluded nevertheless that the area must be analyzed as one combined roadless area of more than 6,000 acres. *Id.* at 1077-78 & n.3. Here, the Upper Cummins Creek roadless area contains approximately 1,000 acres of uninventoried land and is contiguous to an inventoried roadless area of approximately 12,000 acres. Following *Smith*, we consider the Upper Cummins Creek roadless area not in isolation, but in combination with the contiguous inventoried roadless area. It is undisputed that this “roadless expanse” contains more than 5,000 acres.

Additionally, the Wilderness Act does not limit the potential for wilderness designation to roadless areas 5,000 acres or larger. The Act states that an area is suitable for wilderness designation if it meets several requirements, including that the area “has at least five thousand acres of land *or* is of sufficient size as to make practicable its preservation and use in an unimpaired condition.” 16 U.S.C. § 1131(c) (emphasis added). As we explained in the original appeal, “[t]he Wilderness Act does not require an absolute minimum of 5,000 acres; it also allows for designation where the area ‘is of sufficient size as to make practicable its preservation and use in an unimpaired condition.’” *Lands Council*, 479 F.3d at 640 (quoting 16 U.S.C. § 1131(c)).

The roadless area in *Smith*, of course, contained more than 5,000 acres, so naturally we discussed the issues by reference to “a 5,000 acre roadless area.” But the foundation for the rule—the potential for wilderness designation under the Wilderness Act—demonstrates that the rule applies with equal force to roadless areas “of sufficient size as to make practicable its preservation and use in an unimpaired condition.” 16 U.S.C. § 1131(c). In particular, we hold that “the possibility of future wilderness classification triggers, at the very least, an obligation on the part of the agency to disclose the fact that development will affect a 5,000 acre roadless area,” *Smith*, 33 F.3d at 1078, or will affect an area of sufficient size as to make practicable its preservation and use in an unimpaired condition. We need not explore the smallest possible area that would be “sufficient” under the statute; we are confident on this record that the 4,284-acre West Tucannon roadless area is of sufficient size to fall within the rule.

In summary, the Forest Service was required to discuss the effects of the proposed logging on the roadless character of both roadless areas. *Smith* held that the size of an uninventoried roadless area must be considered in combination with the size of any contiguous inventoried roadless area. The size of Upper Cummins Creek combined with the size of contiguous Willow Springs is more than 5,000 acres.

We make clear today that the rule in *Smith* applies to roadless areas that are either greater than 5,000 acres *or* of a “sufficient size” within the meaning of 16 U.S.C. § 1131(c). The West Tucannon roadless area falls within the scope of that rule. Defendants next argue that, even if the Forest Service was required to include a discussion of the roadless areas, the EIS in fact includes such a discussion. The EIS does contain a three-page analysis on “roadless character,” but the cursory nature of the discussion and legal errors in it render it insufficient to meet the requirements of NEPA.

In three separate passages, the EIS erroneously declares that 5,000 acres is an absolute minimum size criterion for potential designation as a wilderness area. *See* EIS at 3-270 (“There are no other areas within the School Fire Salvage Recovery Project area that meet or exceed the 5,000 acre size criteri[on] for roadless.”); *id.* (“There are no large blocks of land where the undeveloped character of the area meets the minimum criteri[on] of 5,000 acres or greater that might make them potentially designated as an [inventoried roadless area] or wilderness area.”); *id.* at 3-271 (“There would be no direct, indirect, or cumulative effects to alter the undeveloped character of any land because there are no large blocks that meet the minimum criteri[on] of 5,000 acres or greater.”). The EIS erroneously adds that “[n]or are there areas of undeveloped character adjacent to an existing [inventoried roadless area] or wilderness area suitable for consideration.” *Id.*; *see also id.* At 3-270 (nearly identical statement).

Wholly apart from those errors, we conclude that the EIS’s discussion fails to meet even the bare minimum requirement discussed in *Smith* and analyzed above: “the possibility of future wilderness classification triggers, *at the very least*, an obligation on the part of the agency to disclose the fact that development will affect a 5,000 acre roadless area.” *Smith*, 33 F.3d at 1078 (emphasis added). Upper Cummins Creek, combined with the contiguous inventoried roadless area, comprises one roadless area much larger than 5,000 acres. That fact is nowhere revealed in the EIS. As in *Smith*, “nowhere has the agency disclosed that the inventoried and uninventoried lands together comprise one 5,000 acre roadless area.” *Id.* at 1079. Similarly, the West Tucannon roadless area contains nearly 5,000 acres (i.e., is “of sufficient size”) but the EIS never discloses that fact.”

## **Summary of Required Analysis for Unroaded Lands Contiguous to Roadless Areas**

Based on court history, projects on lands contiguous to roadless areas must analyze the environmental consequences, including irreversible and irretrievable commitment of resources on roadless area attributes, and the effects for potential designation as wilderness under the Wilderness Act of 1964. This analysis must consider the effects to the entire roadless expanse – that is both the roadless area and the unroaded lands contiguous to the roadless area.

## Roadless Areas - Introduction

### Identify what roadless area(s) is potentially affected.

The project area boundary encompasses all or part of XXX Roadless Area(a). The XXX Roadless Area is xxx acres in size and the project area overlaps with xxx acres. If more than one roadless area is affected describe each one separately and analyze the effects separately.

### Describe the purpose and methodology of the analysis

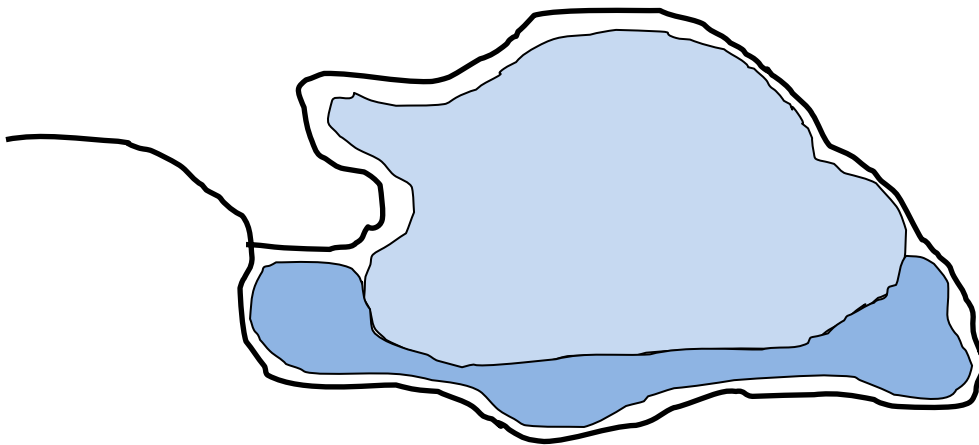
The purpose of the analysis on the roadless resource is to disclose potential effects to roadless and wilderness attributes and determine if, or to what extent it might affect future consideration for wilderness recommendations. This analysis focuses on the potential effects of project activities on wilderness characteristics as defined in the Forest Service Handbook (FSH) 1909.12 (72.1). Wilderness characteristics, as defined at FSH 1909.12 (72.1) and evaluated here include the following:

1. Natural – The extent to which long-term ecological processes are intact and operating.
2. Undeveloped – The degree to which the impacts documented in natural integrity are apparent to most visitors
3. Outstanding opportunities for solitude or primitive unconfined recreation – Solitude is a personal, subjective value defined as the isolation from sights, sounds, and presence of others and from developments and evidence of humans. Primitive recreation is characterized by meeting nature on its own terms, without comfort and convenience of facilities.
4. Special features and values – Unique ecological, geographical, scenic, and historical features of an area.
5. Manageability – The ability to manage an area for wilderness consideration and maintain wilderness attributes.

The analysis for the effects on other roadless resource attributes such as water resources, soils, and wildlife habitat may be found in other sections of the NEPA document.


### Describe the analysis area boundary

If the project area is within a roadless area<sup>3</sup> or within unroaded lands contiguous to a roadless area, then the analysis boundary includes the entire roadless expanse. Utilize the inventory criteria in FSH 1909.12 71.1 to determine if the unroaded lands contiguous to a roadless area meet the inventory criteria<sup>4</sup>. If the lands meet the inventory criteria then the bounds of analysis is the entire roadless area expanse, that is, the uninventoried lands contiguous to roadless area, in addition to the roadless area. Note: consider and respond to public comment that requests other unroaded lands be considered in the analysis. The analysis boundary may be described in a descriptive format vs. creating a map.



Bounds of analysis = The ENTIRE roadless area expanse

Roadless area  +

Uninventoried land contiguous to the roadless area 

Forest Road 

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<sup>4</sup> Note: Consider areas less than 5,000 acres if they are contiguous to an existing inventoried roadless area.

## Introduction

Describe the Land and Resource Management Plan direction for the lands in the roadless area expanse. Suggested wording:

The XXX Forest Plan established Forest-wide multiple use goals, objectives, and management area requirements as well as management area prescriptions... The analysis of roadless lands, documented in Appendix C of the FEIS for the Plan, described each roadless area, the resources and values considered, the range of alternative land uses studied, and the effects of management under each alternative. As a result to the analysis some roadless areas were recommended for inclusion in the National Wilderness Preservation System and others were assigned various non-wilderness prescriptions. The XYZ roadless area was assigned to Management Areas (MA) B, C, and D. The proposed action would occur within MA C, which ..... The uninventoried lands contiguous to the XYS roadless area was assigned to MA D, which ....

The forest plan did not make an “irreversible and irretrievable” commitment of resources to develop. The purpose of this analysis is to evaluate the environmental consequences of the proposed action and alternatives on the wilderness characteristics in the roadless area expanse.

## Environmental analysis for each of the wilderness attributes

Describe the affected environment and environmental consequences on each of the wilderness attributes for the entire roadless area expanse (this includes uninventoried lands contiguous to roadless areas) for each alternative considered in detail. Information from the forest plan, Appendix C can provide information regarding the wilderness attributes. Utilize this information and update it based on activities that have occurred since the forest plan was developed. Describe the changes that have occurred since the Forest Plan was signed in the affected environment sections.

**Natural** – The extent to which long-term ecological processes are intact and operating.

Affected Environment - Describe the current condition, including both intended and unintended effects of modern people on ecological systems in the roadless area expanse. Consider factors such as:

- a) The presence of non-native species that alter the composition of natural plant and animal communities (such as non-native plants, animals, fish, livestock, invertebrates, and pathogens).
- b) Developments that reduce the free-flowing condition of rivers and streams (such as dams or other water diversions and impoundments).
- c) The presence of light pollution that reduces night sky quality and night sky quality related values.
- d) The presence of pollutants that reduce water quality; and
- e) The health of ecosystems, plant communities, and plant species that are rare or at risk.

Direct and Indirect Effects - Address this attribute by describing the extent of modification that would occur in the roadless area expanse (i.e. length of roads built, facilities constructed, vegetation modified, use expanded or contracted) and how this would affect long-term ecological processes. Effects should be judged from a layman's point of view. Reference to other sections of the document and summarize the findings in relation to the roadless resource.

**Undeveloped** – The degree to which developments and uses are apparent to most visitors. Consider such factors as:

- a) Presence of roads and trails
- b) Presence of developments (campgrounds, dams, structures, facilities)
- c) Use of motorized equipment, mechanical transport, landing of aircraft.

Affected Environment - Describe the current condition, including presence of structures, construction, habitations, and other evidence of modern human presence or occupation. Describe the present day physical indicators such as the presence and development level of trails, campsites, structures and facilities as well as the use of motorized equipment, mechanical transport, landing of aircraft, etc. used for administrative purposes. Describe what the visitor would experience.

Direct and Indirect Effects - Describe the extent of modification (i.e. vegetation medication, structures required, motorized equipment use, etc.) that would occur during the projects duration or resulting after the project is finished. Describe whether or not the action occurs in an existing developed area, or would in an undeveloped area. If in a developed area describe how those impacts either add to, reduce, or have no change in the developed character. If in an undeveloped area describe how those impacts impact the undeveloped character.

**Outstanding opportunities for solitude or primitive unconfined recreation** – Solitude is a personal, subjective value defined as the isolation from sights, sounds, and presence of others and from developments and evidence of humans. Primitive recreation is characterized by meeting nature on its own terms, without comfort and convenience of facilities. Consider factors such as:

- a) Distance from roads and trails
- b) Topographic features, including screening from sights and sounds
- c) Uses that could affect solitude and/ or noise (such as motorized equipment, mechanical transport, landing of aircraft)
- d) Presence of developments
- e) Experiences available (with and without developments)
- f) Recreational challenges (rock climbing, hiking, etc)

Affected Environment - Describe the current condition for solitude by describing the presence of screening, distance from impacts to the rest of the area. Describe the current condition for primitive recreation by describing the experiences available without

developments. Describe whether or not there are areas that would provide a high degree of challenge and reliance on outdoor skills rather than facilities.

Direct and Indirect Effects - Describe how the project activities affect the ability of a visitor to escape project impacts on solitude within the area. If the area has some existing uses that affect the ability to have solitude or have quiet areas, discuss how the project activities increase, decrease or continue those affects. Discuss any design criteria or mitigation measures that could affect solitude, such as the timing of disturbances.

Address the effects on primitive unconfined recreation by describing how the project activities might affect, the number and type of opportunities available, the challenge of the opportunities, and the addition or absence of facilities.

**Special features and values** – Unique ecological, geographical, scenic, and historical features of an area. Consider factors such as:

- a) Ecological (unique plant and animal habitat)
- b) Geologic features – Special interest areas
- c) Scientific – Research Natural Areas
- d) Educational
- e) Scenic
- f) Historic
- g) Cultural

Affected Environment - Describe the current condition including the ecological, geologic, scientific, educational, scenic or historical or cultural significance. Summarize and reference other parts of the NEPA document. Describe any unique fish and wildlife species, unique plants or plant communities, potential or existing research natural areas, outstanding landscape features, and significant cultural resource sites. Identify any of these values that exist within the project area.

Direct and Indirect Effects - Describe the effect proposed activities would have on special features and values.

**Manageability** – The ability to manage an area for wilderness consideration and maintain wilderness attributes. Consider factors such as:

- a) Development since the forest plan
- b) Size and shape
- c) Boundary – of the roadless area and roadless area expanse
- d) Access

Affected Environment - Describe the current condition, including any changes made since the forest plan that could affect the area's ability to be considered for wilderness consideration.

Direct and Indirect Effects - Describe the effects of the project by discussing how the proposed activities may affect the boundary location, the size, the shape, and the access

to the area. Describe whether or not the area (including the roadless area expanse) will continue to meet the 5,000 acre criteria.

### Cumulative Effects

#### **Identify the cumulative effects boundary in space and in time.**

Describe the cumulative effects boundary – this will be the roadless area expanse. Describe what factors this is based on.

Describe the temporal boundary – this will be how long affects of the action will occur on the landscape. Describe what factors this is based on.

**Describe the past actions and their effects on current conditions.** Describe what past actions were considered and summarize how they affected the five wilderness attributes described above. If there are comments that other past actions should have been considered discuss why they were or were not.

**Contrast the effects of proposed actions with past actions.** Describe how past actions were developed in relation to the roadless resource and how this proposal considered the roadless resource in its design (e.g. summarize the past actions that occurred, whether or not the actions occurred before or after the forest plan was established, whether or not those past actions were designed to minimize effects on the roadless resources (and if so whether or not they were effective) and how this proposed action contrast with those past actions.

**Describe the effects of ongoing and reasonably foreseeable actions.** Identify what actions were considered. If there are comments that others should have been considered discuss why they were or were not. Describe how these actions could affect the five wilderness attributes.

**Describe the combined effects from past, proposed, ongoing, and reasonably foreseeable future actions.** Describe the cumulative effects of the proposed action, in addition to the past, present and reasonably foreseeable actions on the five wilderness attributes. Describe whether or not there would be irreversible or irretrievable commitment of resources.

### Summarize Regulatory Consistency

Consistency with forest plans

Consistency with other regulations governing roadless areas (see separate paper)